Motors Liquidation Company Avoidance Action Trust v. JPMorgan Chase Bank, N.A., et al (No. 09-00504-MG)

Dear Ms. Anderson:

The undersigned are counsel to the four largest term-lender defendant groups in the above-captioned adversary proceeding, collectively representing approximately $1.2 billion (over 75 percent) of the principal of the Term Loan outstanding on June 30, 2009 ("Movants"). Each group has moved to dismiss or for judgment on the pleadings, in filings docketed at Nos. 226, 262, 377, and 390. On February 11, 2016, this Court approved a request by Plaintiff (to which Movants did not object) to file an omnibus brief not to exceed sixty pages in response to Movants' motions. That responsive brief is due March 4.

Each of the four separate defendant groups respectfully requests the Court's permission to file a reply brief not to exceed twenty pages. In connection with obtaining Movants' non-objection to their sixty-page response, counsel for Plaintiff, copied on this email, informed us that they do not object to twenty pages for each Movant's reply. Such an extension would allow each of the Movant groups——who, with respect to the grounds for dismissal that their motions have in common, have made arguments that differ in certain respects——to reply adequately to Plaintiff. The four groups will of course seek to coordinate with one another to avoid duplication.

We thank the Court for its attention to this request.

Respectfully,

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MEMORANDUM ENDORSED. IT IS SO ORDERED.

DATED: **February 29, 2016** ______**/s/Martin Glenn**____________________

UNITED STATES BANKRUPTCY JUDGE, SDNY